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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

METRO NEWSPAPER ADVERTISING SERVICES INC.

Chapter 11
Case No. 17-22445 (rdd)

Debtor.

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**APPLICATION FOR ORDER EXTENDING TIME FOR
FILING SCHEDULE OF ASSETS AND LIABILITIES AND
STATEMENT OF FINANCIAL AFFAIRS**

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE:**

Metro Newspaper Advertising Services Inc., the above-captioned debtor and debtor-in-possession (the “Debtor”), by its proposed attorneys, DelBello Donnellan Weingarten Wise & Wiederkehr, LLP, hereby submits this application (the “Application”) for entry of an order extending the Debtor’s time to Schedules of Assets and Liabilities and Statement of Financial Affairs (collectively, the “Schedules”). In support of this Application, the Debtor respectfully states as follows:

Jurisdiction

1. The Court has jurisdiction over this Application under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are §§ 521 of Title 11 of the United States Code, 11 U.S.C. §§101, et seq. (the “Bankruptcy Code”) and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

Background

3. On March 27, 2017 (the “Filing Date”), the Debtor filed a voluntary petition for reorganization pursuant to Chapter 11 of the Bankruptcy.

4. The Debtor has continued in possession of its business and management of its business affairs pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

5. No trustee, examiner or creditors' committee has been heretofore appointed in this proceeding.

6. The Debtor operates a newspaper advertising service company and is located at 28 Wells Avenue, Yonkers, New York 10701.

RELIEF REQUESTED

7. At or about the time the Debtor filed its voluntary petition commencing this case, it included lists of all of its creditors and their addresses to the extent known by Debtor, but did not complete and file the Schedules of Assets and Liabilities and Statement of Financial Affairs (collectively, the “Schedules”). The Debtor’s books and records, which are needed to complete the Schedules, are currently being reviewed by the Debtor, together with his counsel, in order to

gather and analyze the information needed to file his Schedules. However, the Debtor does not anticipate having this review complete in time to comply with the fifteen (15) day time limit for the filing of Schedules.

8. The Debtor expects to have all necessary information to enable it to complete the preparation of the aforementioned Schedules by May 5, 2017, and thus the Debtor desires an extension of time until such date within which to complete and file its Schedules.

9. No prior request for the relief sought herein has been made heretofore.

WHEREFORE, the Debtor respectfully requests that the Court enter the pre-fixed Order extending to and until May 5, 2017 the date by which the Debtor's Statement of Financial Affairs and Schedule of Assets and Liabilities must be filed herein, and for such other and further relief as is just and proper under the circumstances.

Dated: White Plains, New York
March 27, 2017

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By: /s/ Jonathan S. Pasternak
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